



ATTORNEYS AT LAW

covered

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May 8, 2017

**Certified Mail – RRR
Regular Mail and Telecopy**

Mark W. Morris, Esq.
Clark Law Firm
811 Sixteenth Avenue
Belmar, NJ 07719

Re: Joao Abilio Silva, et al v. Conti Enterprises, Inc., et als.
Docket No. MID-L-7167-15
Your File No.: 15-94

NOTICE OF FRIVOLOUS SUIT, INTENT TO SEEK SANCTIONS

Dear Mr. Morris:

Please be advised that this firm has been retained to represent Jacobs Engineering Group, Inc. ("Jacobs") in connection with the above-captioned matter. The purpose of this letter is to inform you that we consider your filing of the Third Amended Complaint and jury Demand against Jacobs in this matter frivolous and not in conformance with the Order entered by the Court on February 17, 2017. Accordingly, if you fail to withdraw the Third Party Complaint and dismiss the claim against Jacobs within twenty-eight (28) days of this letter, we intend to seek sanctions against you pursuant to Rule 1:4-8(b) and against your client pursuant to N.J.S.A. 2A:15-59.1.

Specifically, the Order dated February 17, 2017 served with the Complaint does not grant leave to file a Third Party Complaint against Jacobs. For your convenience I am attaching a copy of that Order. If there is another Order permitting you to file such a Third Party Complaint, please provide it to us immediately.

Mark W. Morris, Esq.

May 9, 2017

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Please be advised that if your client chooses to continue prosecuting this application, we have been instructed to, and will, file an application for sanctions pursuant to N.J.S.A. 2A:15-59.1 and seek any and all other remedies available at equity and law.

Please be guided accordingly. Should you have any questions, please feel free to contact me.

Very truly yours,



Stuart M. Lederman

SML/est

cc: James s. Dobis, Esq. (via fax and regular mail)

Michel Devins, Esq. (via fax and regular mail)